

**WOOD PROTECTION COMPANY
SITE INSPECTION**

Prepared For:

**Texas Water Commission
State Superfund Unit**

D87061

JN 117203

JONES AND NEUSE, INC.
Engineering and Environmental Consultants
Austin-Houston-Belton-Corpus Christi-Temple-Orange

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June, 1967

9418207





JONES AND NEUSE, INC.

Engineering and Environmental Consultants

AUSTIN - HOUSTON - BELTON - CORPUS CHRISTI - TEMPLE - ORANGE

August 31, 1987

Ms. Christy Smith, Head
State Subfund Unit
Hazardous and Solid Waste Division
Texas Water Commission
P.O. Box 13087
Austin, Texas 78711

Re: Site Inspection of Wood Protection Company
JN 117203
TWC 14-70020

Dear Ms. Smith:

Contained herein is the final Site Inspection Report prepared pursuant to the investigation of the above referenced facility. We trust that you will find this report acceptable and have enjoyed working for you and the Commission on this project. Should you have any questions or require any additional information, please feel free to call me at 512/327-9840.

Sincerely,

JONES AND NEUSE, INC.

Michael G. Dick

Michael G. Dick
Project Manager

MGD/jlb

Attachment

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- A. Data Collection Guideline
- B. Laboratory Data Sheets (Not Applicable, No Samples)
- C. County Map
- D. USGS Map

10-2-87

SECTION, I
EXECUTIVE SUMMARY

I. EXECUTIVE SUMMARY

Jones and Neuse, Inc. (JN) was retained by the Texas Water Commission (TWC) to perform site inspections at potential hazardous waste sites. The site described herein was designated by the TWC pursuant to 31 TAC Sections 335.341-335.348 and TWC Contract No. 14-70020 concerning the hazardous waste facility assessment and remediation program, commonly referred to as the State Superfund.

The Wood Protection Company is an active business located at 5151 South Loop East in Houston, Texas. The company treats wood products with copper-chrome-arsenic (CCA) and a flame retardant (containing ammoniated inorganic phosphates). Sumps are in place to collect treating solution for reuse. According to the company, rainwater is also collected and mixed with the chemicals so that contaminated runoff does not occur. In February, 1983, a TDWR inspector reported that sulfuric acid is added periodically to break down any accumulated sludge.

On December 18, 1985 Engineering Science, Inc. conducted a RCRA 3012 preliminary assessment of the Wood Protection Company facility located in Houston, Texas. The assessment consisted of a review of available file information and off-site surveillance with photographs. The surveillance revealed that the plant is enclosed by a wooden privacy fence. Five upright white tanks, lumber shelters, a treatment area, and the main office were observed. Details of the treating area were not visible. Surrounding land uses are commercial and residential.

The site has undergone one TDWR solid waste compliance inspection. The file information indicated that deficiencies determined from the inspection were resolved by the company.

JN conducted a site inspection on March 30, 1987. This inspection confirmed previous indications that waste was managed in an acceptable

manner and collected for off-site disposal. It is not known if the company used any other wood-preserving material since the start of the operation in 1957.

SECTION II
SITE INSPECTION NARRATIVE

III. SITE INSPECTION NARRATIVE

JN conducted a site inspection on March 30, 1987. This inspection confirmed previous indications that the site was an active RCRA facility. Observations during the site visit also indicated that waste was managed in an acceptable manner and collected for off-site disposal.

The JN inspection team arrived on-site at 3:45 p.m. on March 30, 1987. Team members were briefed by Marc Hoover of Wood Protection Company (WPC) and Tom Marr of Osmost. Osmost is the chemical supplier of the copper-chrome-arsenic (CCA) wood preserving materials used by WPC. The Osmost address is P.O. Drawer 0, Griffin, Georgia, 30224.

A walk through inspection of the facility was undertaken. It was stated that the facility at this site had been in operation since 1952. Some plant expansion over the years has led to the current configuration (see Figure 1). The plant consists of three pressure cylinders. Steam is not used in the process.

Drainage control was evidenced by roofing over most of the treatment area diverting rainfall, concrete paving providing an impermeable surface, and drains to sumps providing for collection of any product drippage or contaminated runoff. This runoff is collected and used as makeup water in the process.

According to WPC and Osmost, some sludges in sumps accumulate and are occasionally removed and shipped off-site for disposal. The previous file reference to using acid to destroy sludges is a practice which is no longer employed. When waste is generated, WPC notifies Osmost who picks up the waste at the time of product delivery. The WPC waste is manifested in Osmost trucks via DOT 55 gallon drums in a compartment in the trucks.

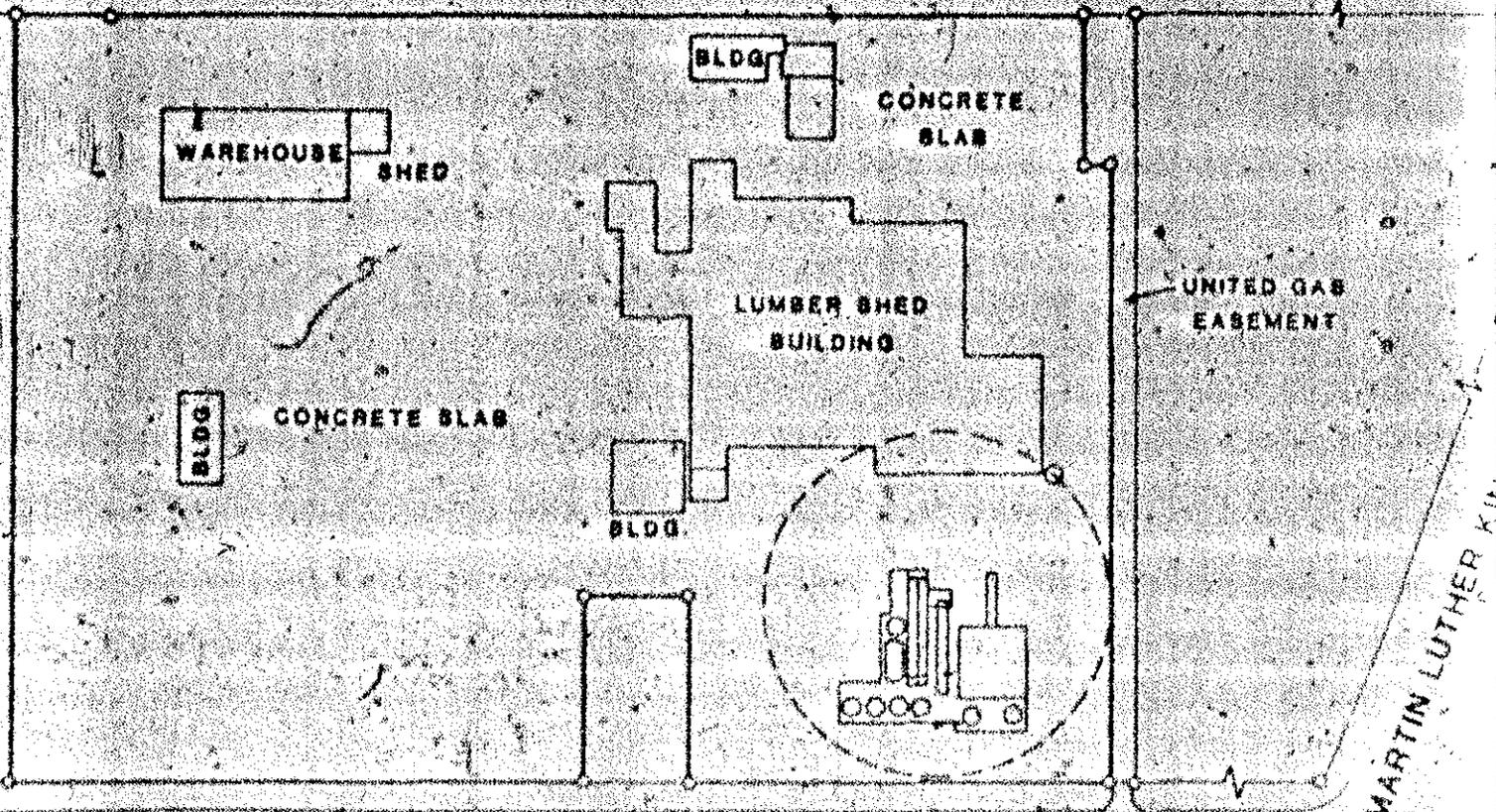
The transporter was indicated to be Osmost Wood Preserving, Inc. (E.P.A ID# TND 051140416) and the usual disposal site was Chemical

Waste Management, Inc. in Emile, Alabama or Earth Industrial Waste Management (E.P.A ID# TND 000814321) 536 Flite Road, Millington, Tennessee 38053.

Figure 2 shows site photographs. Overall the photographs document the clean and neat appearance of the facility. No conditions were found which would lead to sample acquisition at this site. The occasional waste storage in drums was inside a curbed area within a roofed and walled building in an area co-located with unregulated product storage (see Photo 1). Tankage has secondary containment (see Photo #2) and facilities appear to have adequate capacity to manage rainfall. Piping apparently allows for use of several tanks should the need arise. (The entire manufacturing process area has a concrete base which is gently sloping to drains and sumps to collect rainfall and divert run-on from nonprocess areas (see Photos #3 and #4). Figure 3 is a flow diagram of the process at WPC.

Additional information concerning the facility and the JN inspection is contained in Table 1, TWC Site Inspection Report and Attachment A, Data Collection Guideline. The location of the site with respect to regional features is shown in Attachment C, County Map and in Attachment D, USGS Map.

G.H. & S.A. R.R. 100' R.O.W.



I-670 SOUTH LOOP EAST SERVICE ROAD

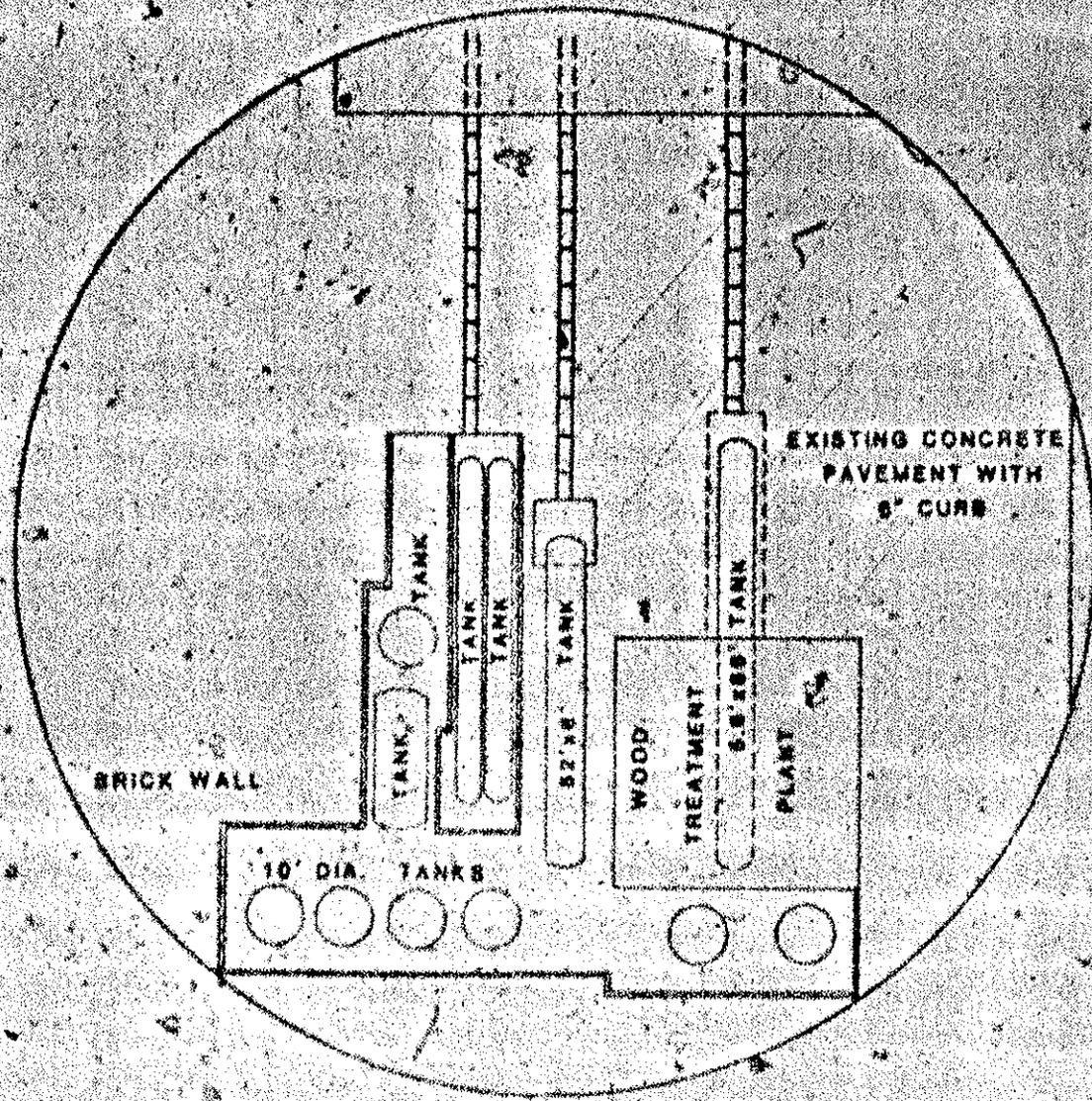


0 100 FEET

MARTIN LUTHER KING

UNITED GAS
EASEMENT

MARTIN LUTHER KING BLVD.



WOOD PROTECTION CO
SITE FEATURES MAP
Figure 1



JONES AND NEUSE, INC.
Engineering and Environmental
Consultants

PHOTOS

FIGURE 2 SITE PHOTOGRAPHS

Note: Photographs have been renumbered for clarity in this report.
Numbers in parenthesis refer to the photograph number on a particular roll of film and described in JN field notes.

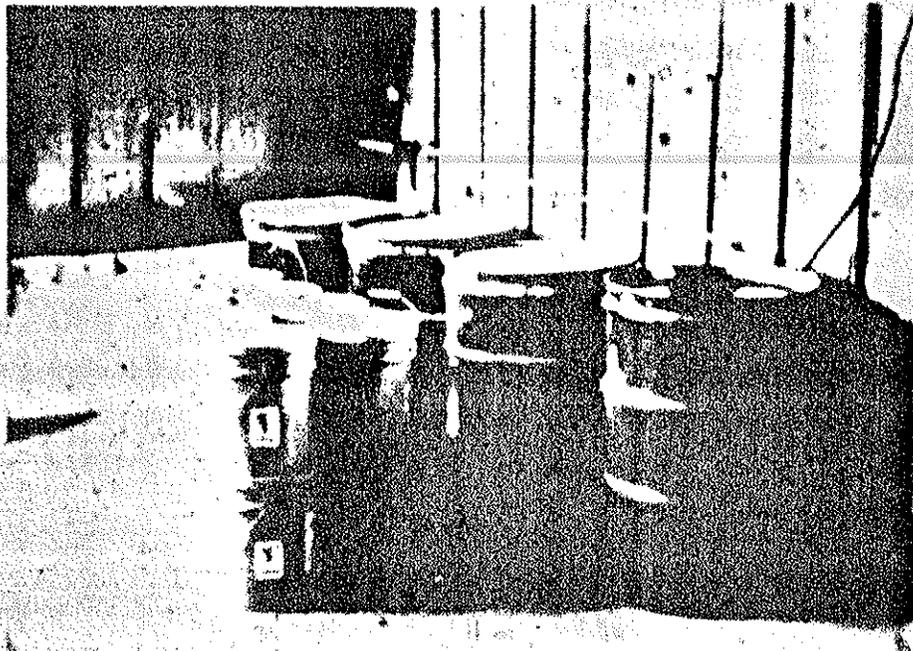


Photo #1 (21)

Wood Protection Company

Storage Area

Note product storage and empty waste drums.



Photo #2 (23)

Wood Protection Company

Stormwater Storage Tanks

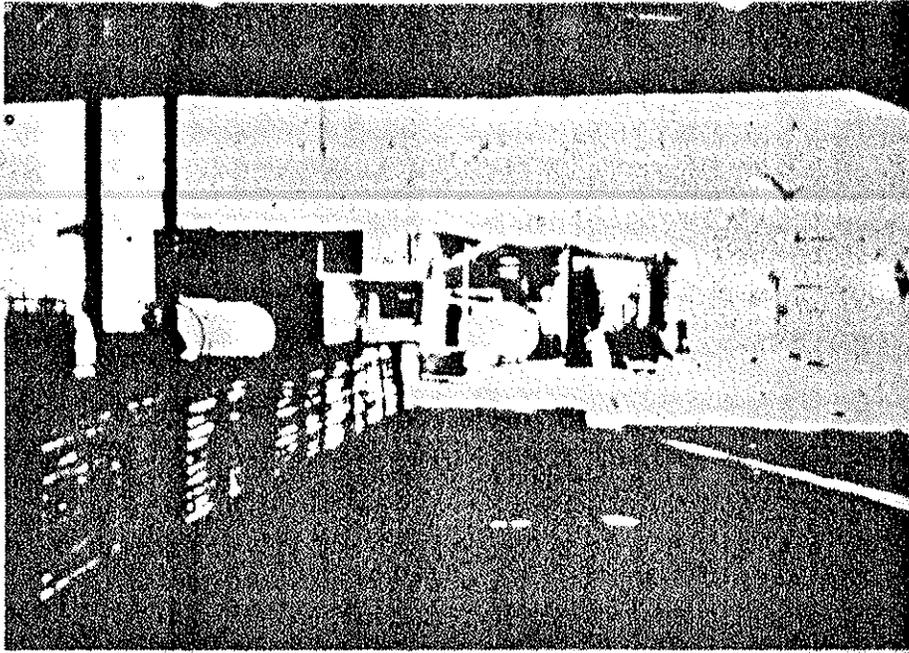


Photo 13 (18)
Wood Protection Company
Drip Area
South view towards cylinders.

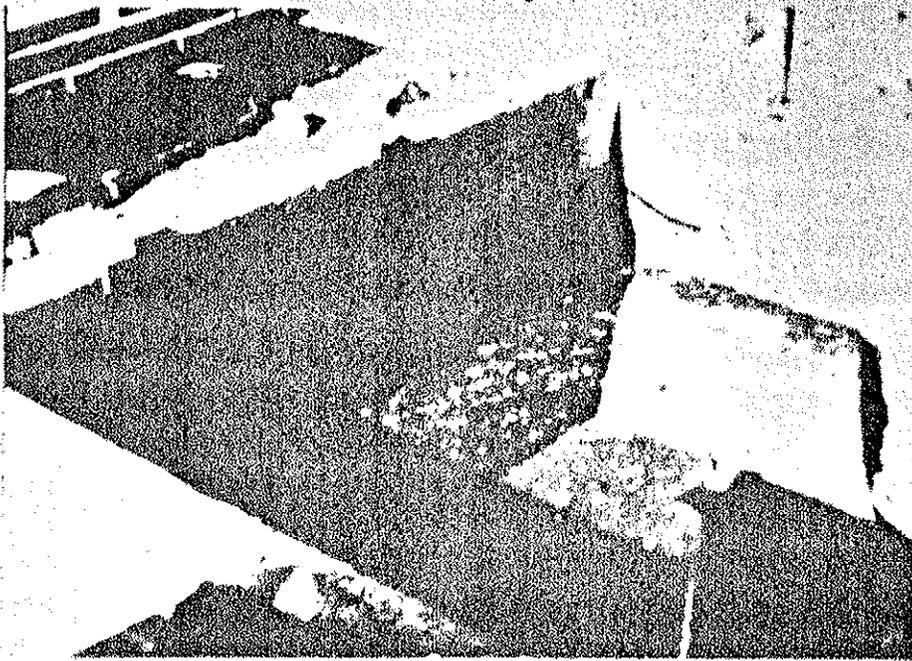


Photo 14 (20)
Wood Protection Company
Sump Area
Note drainage piping to sump.

TABLE I
TWC SITE INSPECTION REPORT



State Superfund
Inspection Report

District
7

Inspection Date

March 30, 1987

CERLIST

Registration #
32010

District Contact
Sandy Parker

Abandoned?
No

EPA Id

I. SITE IDENTIFICATION

A. Site Name Wood Protection Company		B. Street (or other identifier) 5151 South Loop East	
C. City Houston	D. State Texas	E. Zip Code 77033	F. County Harris

G. Site Contact Information

1. Name Marc Hoover		2. Telephone Number (800) 392-5670	
3. Street 5151 South Loop East	4. City Houston	5. State Texas	6. Zip Code 77033

H. Land Owner Information

1. Name Wood Protection Company		2. Telephone Number (800) 392-5670	
3. Street 5151 South Loop East	4. City Houston	5. State Texas	6. Zip Code 77033

I. Other

1. Name	2. Relationship	3. Title	
4. Street	5. City	6. State	7. Zip Code

II. INSPECTION INFORMATION

A. Preparer Information

1. Name Charles R. Faulds		2. Title Engineer	
3. Street 2720 Bee Cave Road	4. City Austin	5. State Texas	6. Zip Code 78746
7. Organization Jones and Neuse, Inc.		8. Telephone No. (area code) (512) 327-9840	

B. Inspection Participants

1. Name	2. Organization	3. Telephone No.
A. Faulds	Jones and Neuse, Inc.	(512) 327-9840
M. Renkin	Jones and Neuse, Inc.	(512) 327-9840
G. Edmore	Texas Water Commission	(512) 463-7794

C. Site Representatives Interviewed (corp. officials, wkrs., residents)

1. Name	2. Organization	3. Telephone No.
Marc Hoover	Wood Protection Company	(713) 733-7421
Tom Marr	Osmose	

<u>N/A</u>	Depth (in feet) to uppermost aquifer - measured vertically from the lowest point of the hazardous substances to the highest seasonal level of the saturated zone of the aquifer of concern.
<u>N/A</u>	Depth (in feet) from the ground surface to the lowest point of waste disposal/storage.
<u>N/A</u>	<p>Physical State - the state of the hazardous substance at the time of disposal.</p> <p>a. Solid, consolidated or stabilized b. Solid, unconsolidated or unstabilized c. Powder or fine material d. Liquid sludge or gas e. Unknown - comments <u>No Disposal</u></p>
<u>0</u>	Containment - See <u>Ground Water Chart</u>
<u>0</u>	<p>Hazardous Waste Quantity - Quantity of hazardous substances deposited at a site except when completely contained. Do not include amounts of contaminated soil or water; in such cases the amount of contaminating substance may be estimated.</p> <p>Wastes completely contained.</p>
	<p>Basis of estimating and/or computing waste quantity:</p> <p>N/A</p>
	<p>Location of nearest well drawing from the uppermost aquifer or building not served by a public water supply:</p> <p>N/A City of Houston Public Water Supply</p>
<u>1%</u> or less	Average Slope of facility in percent.

Name/description of nearest downslope surface water:
Drainage ditch to the Houston Ship Channel.

12
or less

Average slope of terrain between facility⁹ and above-cited surface water body in percent.

0

Containment - See Surface Water Chart.
Containment provided.

No

Is there tidal influence?

Circle appropriate land use, describe and designate location in relation to facility.

Industrial - Commercial

Coastal Wetland
Fresh-water Land
Critical Habitat
National Wildlife Refuge

Comments: Facility is active wood preserving plant generating small amounts of waste. Contaminated stormwater is contained and reused in process.

Weather Conditions: Windy, Warm

Noticeable Odors? Air Monitoring Conducted?

No noticeable odors. No air monitoring conducted.

Security: Site is fenced with gates at entrance and exit points. Facility personnel on-site for access control.

CONTAINMENT VALUES FOR SURFACE WATER ROUTE

<p>A. <u>Surface Impoundment</u></p> <ol style="list-style-type: none"> 1. Sound diking or diversion structure, adequate freeboard, and no erosion. 2. Sound diking or diversion structure, but inadequate freeboard. 3. Diking not leaking, but potentially unsound. 4. Diking unsound, leaking, or in danger of collapse. 	<p>C. <u>Waste Piles, or Surface Soils*</u></p> <ol style="list-style-type: none"> 1. Piles are covered and surrounded by sound diversion or containment system. 2. Piles covered, wastes unconsolidated, diversion or containment system not adequate. 3. Piles not covered, wastes unconsolidated, and diversion or containment system potentially unsound. 4. Piles not covered, wastes unconsolidated, and no diversion or containment or diversion system leaking or in danger of collapse.
<p>B. <u>Containers</u></p> <ol style="list-style-type: none"> 1. Containers sealed, in sound condition, and surrounded by sound diversion or containment system. 2. Containers sealed and in sound condition, but not surrounded by sound diversion or containment system. 3. Containers leaking and diversion or containment structures potentially unsound. 4. Containers leaking, and no diversion or containment structures or diversion structures leaking or in danger of collapse. 	<p>D. <u>Landfill or Subsoils,</u></p> <ol style="list-style-type: none"> 1. Landfill slope precludes runoff, landfill surrounded by sound diversion system, or landfill has adequate cover material. 2. Landfill not adequately covered and diversion system sound. 3. Landfill not covered and diversion system potentially unsound. 4. Landfill not covered and no diversion system present, or diversion system unsound.

* Note Slope of Piles

CONTAINMENT VALUE FOR GROUND WATER ROUTE

A. Surface Impoundment

1. Sound run-on diversion structure, essentially non-permeable liner (natural or artificial) compatible with the waste, and adequate leachate collection system.
2. Essentially non-permeable compatible liner, with no leachate collection system; or inadequate freeboard.
3. Potentially unsound run-on diversion structure; or moderately permeable compatible liner.
4. Unsound run-on diversion structure; no liner; or incompatible liner.

C. Piles or Surface Soils *

1. Piles uncovered and waste stabilized; or piles covered, waste unstabilized, and essentially non-permeable liner.
2. Piles uncovered, waste unstabilized, moderately permeable liner, and leachate collection system.
3. Piles uncovered, waste unstabilized, moderately permeable liner, and no leachate collection system.
4. Piles uncovered, waste unstabilized, and no liner.

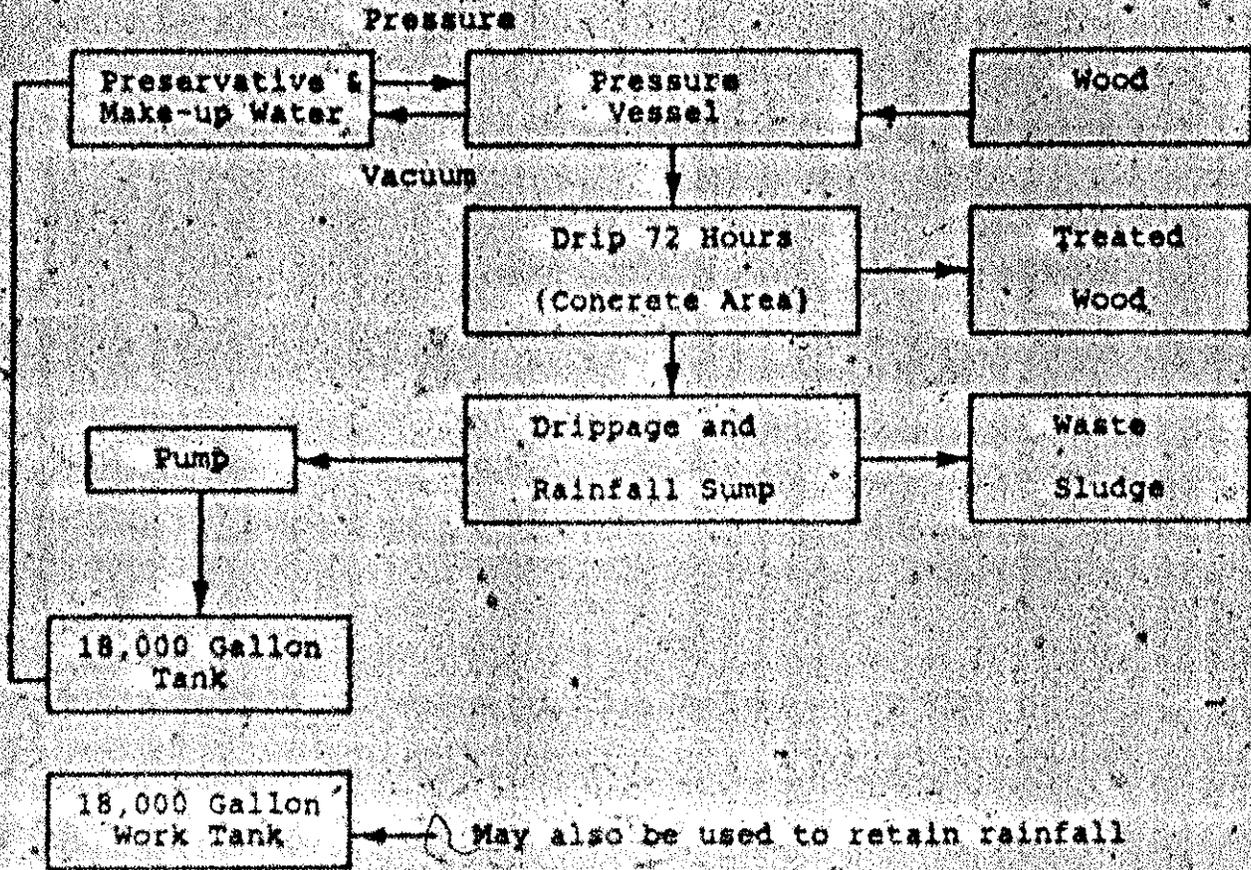
B. Containers

- Containers sealed and in sound condition, adequate liner, and adequate leachate collection system.
2. Containers sealed and in sound condition, no liner or moderately permeable liner.
 3. Containers leaking, moderately permeable liner.
 4. Containers leaking and no liner or incompatible liner.

D. Landfill or Subsoils

1. Essentially non-permeable liner, liner compatible with waste, and adequate leachate collection system.
2. Essentially non-permeable compatible liner, no leachate collection system, and landfill surface precludes ponding.
3. Moderately permeable, compatible liner, and landfill surface precludes ponding.
4. No liner or incompatible liner; moderately permeable compatible liner; landfill surface encourages ponding; no run-on control.

Figure 3
WOOD PROTECTION COMPANY
PROCESS FLOW CHART



ATTACHMENT A
DATA COLLECTION GUIDELINE

DATA COLLECTION GUIDELINE

JN Submittal Date March 9, 1987

TWC Approval Date _____

Site Wood Protection Company (32010)

Team Leader C. Faulda

Team Member M. Renkin

TWC Contacts Guy Tidmore Sandra Parker (D7)

Site Contacts Matc Hoover - Plant Manager 1-800/392-5670

WASTE Type Anticipated Wood Preserving using CCA process

Volume uncertain, recycling is claimed

Samples Anticipated Yes, if actually generated

Screening Analysis pH, Metals

Comments Listed waste, if actually generated, verify by E.P. Tox

SURFACE WATER Availability Drainage from site to Houston Ship Channel

Samples two possible; water or sediment

Comments analyze for copper, chrome and arsenic

GROUNDWATER Availability Gulf Coast Aquifer

Samples Anticipated No

Screening Analysis No

Comments Groundwater release not anticipated

SURFACE SOIL Visible Stains Anticipated Possible; 1 sample composite

analyze for E.P. Toxic copper, chrome and arsenic

Soil Gas Sampling No

DATA COLLECTION GUIDELINE

(continued)

AIR Release Anticipated Not anticipated

COMMENTS

1. Detailed flow chart of process to be developed at site. Inspection to determine actual flow of wastes in recycling process. Inspect for stained soils.

2. If waste is actually generated, then sample will be taken.

3. If waste sample is taken, then water or sediment samples will be taken.

4. One composite soil sample is anticipated to check leak area soils for E.P. Toxicity.

5. Drum storage area to be inspected to determine if it is a product storage area, or possible waste storage area.

6. Background sample of soil if waste is sampled.

SAMPLE DEVIATIONS X NO YES

(Explanation Attached; See Attached Map)

No samples necessary as per TWC representative Guy Tidmore

ATTACHMENT B
LABORATORY DATA SHEETS
Not Applicable To This Report

ATTACHMENT C
COUNTY MAP

TEXAS WATER COMMISSION

Waste
Protection
II



John Hopkins, Chairman
John O. Houschins, Commissioner
J. Wynne, III, Commissioner

James K. Rourke, Jr., General Counsel
Michael E. Field, Chief Examiner
Karen A. Phillips, Chief Clerk

Larry R. Soward, Executive Director

STATE SUPERFUND SITE DISPOSITION

FILMED
DEC 11 1987
SYSTEM 200

TO: The file

FROM: TEXAS WATER COMMISSION
STATE SUPERFUND
P.O. BOX 13087
AUSTIN TEXAS 78711

Site Name: Wood Protection Company
Location: Houston Texas
TWC Registration No.: 17010
EPA ID No.: _____

No further action
Further action needed by:

EPA

TDH

Emergency Response

Site Assessment

TWC

OTHER

District Water Quality

Enforcement

Explain: _____

Remarks:

TWC (Eric Neuse) conducted a site inspection on March 30, 1987. This inspection confirmed previous indications that waste was managed in an acceptable manner and collected for off-site disposal. It is not known if the company did any other wood preserving material since the start of the operation in 1952.